

EXHIBIT C



Proskauer Rose LLP Eleven Times Square New York, NY 10036-8299

November 3, 2022

By Email

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Re: *Donna Wood et al. v. Mike Bloomberg 2020, Inc.*, No. 20 Civ. 2489 (LTS)(GWG)

Dear Counsel:

We write regarding the deposition of proposed class representative, Alan Robinson, which occurred on November 1, 2022. While we are continuing to review the transcript and video from the deposition and considering next steps, there are two issues that require counsel's immediate attention to ensure that they do not occur at any of the upcoming depositions in this case.

First, Ms. Cole-Chu improperly directed Mr. Robinson not to answer questions about a publicly available blog post he wrote about allegations made against him in the workplace. Ms. Cole-Chu did not provide any basis for her instruction. When I asked her to do so, Ms. Cole-Chu said that her instruction was based on proportionality, relevance, privacy, harassment and all constitutional protections, which do not constitute grounds for an instruction not to answer under Fed. R. Civ. P. 30(c)(2). Ms. Cole-Chu then asked if we could have a conversation off-the-record where she could provide me with additional information. In an effort to avoid the need for court intervention, I agreed to discuss the issue with Ms. Cole-Chu off the record. During that conversation, Ms. Cole-Chu repeated the same objections as she had on the record. I asked Ms. Cole-Chu to be more specific regarding her instruction based on alleged "constitutional protections" and she refused. I also said that if there was a Fifth Amendment concern, Mr. Robinson was free to invoke his Fifth Amendment privileges. He did not do that. When we resumed the deposition, Ms. Cole-Chu instructed Mr. Robinson not to answer questions about his blog post or the allegations made against him discussed in that post. We are evaluating our options as to how to proceed regarding this conduct at Mr. Robinson's deposition but want to be clear that we do not expect this type of obstructionist conduct to occur at any upcoming depositions.

Second, Mr. Robinson testified that he had conversations with Ms. Cole-Chu about the substance of his testimony after the deposition was underway that go beyond what is permissible. We have reason to believe that these conversations impermissibly influenced Mr. Robinson's testimony and reserve all rights. We also expect that you will refrain from engaging in such conduct going forward.

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We appreciate your prompt attention to these matters and are hopeful that these infractions will not occur at any of the remaining depositions in this case. We continue to reserve all rights.

Very truly yours,

/s/ Noa M. Baddish

Noa M. Baddish

cc: All Counsel of Record (via Email)